

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT PUERTO RICO

UNITED STATES OF AMERICA	:	
	:	
Plaintiff	:	
	:	CRIMINAL NO. 19-541 (FAB)
v.	:	
	:	
[1] AHSHA NATEEF TRIBBLE, et al.,	:	
	:	
Defendants.	:	
	:	
	..oOo..	

UNITED STATES OF AMERICA’S MOTION FOR LIS PENDENS

TO THE HONORABLE COURT:

COMES NOW, plaintiff, the United States of America, through its undersigned attorneys, and respectfully states and prays as follows:

1. On or about September 3, 2019, a Federal Grand Jury returned an indictment charging violations of Title 18, United States Code, Sections 201(b)(1)(A) and (b)(2)(A), 208, 371, 1343, 1346, 1040, 1952(a)(3), 1001, and 1343. *See* Docket No. 3.
2. Forfeiture allegations were included in connection with Counts One, Two, Three, Four and Five of the Indictment, which provide that defendants [1] Ahsha Nateef Tribble, et al., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal constitutes or is derived from proceeds traceable to said violations. On October 4, 2019, a Bill of Particulars was filed alleging that the following real estate property is subject to forfeiture based on the Forfeiture Allegations set forth in the Indictment.

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All that certain land situated, lying, located and being at Ellison Farms LLC,

0 Ferrell Tatum Road, LaGrange, Troup County, Georgia, to wit:

Real property located at Ellison Farms LLC, 295 Ferrell Tatum Road, LaGrange, Georgia; parcel Number 0910 000056, Deed Book 1956 110; Plat Book and Page, 34 57; Grantee: Ellison Farms LLC.

3. Pursuant to 2010 Georgia Code, Title 44 – Property, Chapter 14 - Mortgages, Conveyances to Secure Debt, and Liens, Article 9 - Lis Pendens § 44-14-610, Necessity of recordation for operation of lis Pendens as to real property (O.C.G.A. 44-14-610 (2010) - No action, whether seeking legal or equitable relief or both, as to real property in this state shall operate as a lis pendens as to any such real property involved therein until there shall have been filed in the office of the clerk of the superior court of the county where the real property is located and shall have been recorded by the clerk in a book to be kept by him for the purpose a notice of the institution of the action containing the names of the parties, the time of the institution of the action, the name of the court in which it is pending, a description of the real property involved, and a statement of the relief sought regarding the property.
4. The lis pendens is to be entered into the official records of the county where the property is located.

WHEREFORE, the United States of America respectfully moves this Honorable Court to enter an order directing the South West Troup County of Georgia to record a lis pendens upon the above-described property, giving notice that the property is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c) and

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Rule 32.2(a) of the Federal Rule of Criminal Procedure.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico this 25th day of November 2019.

W. STEPHEN MULDROW
United States Attorney

s/ Seth A. Erbe _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date, November 25, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/EMF system.

s/ Seth A. Erbe _____

Seth A. Erbe
Assistant United States Attorney